

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT LANDE,

Defendants.

Civil Action No. 1:17-cv-00916

YING ZHAO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT N. LANDE,

Defendants.

Civil Action No. 1:17-cv-00955

DAVID BLINN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC.,
DROR NIV, and ROBERT N. LANDE,

Defendants.

Civil Action No. 1:17-cv-01028

683 CAPITAL PARTNERS, LP, Individually
and On Behalf of All Others Similarly
Situating,

Civil Action No. 1:17-cv-02506

Plaintiff,

v.

GLOBAL BROKERAGE, INC. f/k/a FXCM
INC., DROR NIV, and ROBERT LANDE,

Defendants.

[PROPOSED] ORDER APPOINTING LEAD PLAINTIFFS

On the motion of Movants Adi Damty and Abed Latif (“Movants”), and the Court having read all parties’ papers, and considered all arguments of counsel, and good cause appearing,

IT IS THIS _____ day of _____ ORDERED as follows:

1. Movants are hereby appointed as co-lead plaintiffs. Movants satisfy the requirements for lead plaintiff pursuant to Section 21D(a)(3)(B)(iii) of the Private Securities Litigation Reform Act of 1995 (“PSLRA”).

2. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, the Court approves Movants’ selection of Block & Leviton LLP as lead counsel (“Lead Counsel”).

3. Pursuant to 15 U.S.C. §77z-1(a)(3)(B), Movants have selected and retained the law firm of Gardy & Notis LLP as Liaison Counsel. The Court hereby approves Movants’ selection of Liaison Counsel.

4. Lead Counsel shall have the following responsibilities and duties, to be carried out personally or through counsel whom Lead Counsel shall designate:

- a. to coordinate the briefing and argument of motions;
- b. to coordinate the conduct of discovery proceedings;

- c. to coordinate the examination of witnesses in depositions;
- d. to coordinate the selection of counsel to act as a spokesperson at pretrial conferences;
- e. to call meetings of the plaintiffs' counsel as they deem necessary and appropriate from time to time;
- f. to coordinate all settlement negotiations with counsel for Defendants;
- g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter and to delegate work responsibilities to selected counsel as may be required; and
- h. to supervise any other matters concerning the prosecution, resolution, or settlement of this action.

5. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed by any plaintiffs without the approval of Lead Counsel, so as to prevent duplicative pleadings or discovery by Plaintiffs. No settlement negotiations shall be conducted without the approval of Lead Counsel.

6. Counsel in any related action that is consolidated with this Action shall be bound by this organization of Plaintiffs' counsel.

7. Lead Counsel shall have the responsibility of receiving and disseminating Court orders and notices.

8. Lead Counsel shall be the contact between plaintiff's counsel and defendants' counsel, shall serve as the spokespersons for plaintiff's counsel, and shall direct and coordinate the activities of plaintiff's counsel. Lead Counsel and Liaison Counsel together shall act as the liaison between the Court and plaintiff and his counsel.

9. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody, or

control, including computer-generated and stored information, and materials such as data and electronic mail, containing information which is relevant or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

HON. RONNIE ABRAMS, U.S.D.J.